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Corbin T. Jones
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Corbin:

I am in receipt of your letter dated May 23, 2008 concerning three issues on our April Monthly Report.

Your first issue concerns contributions made to Larry Kissell for Congress. Victory NOW PAC has made three contributions to Kissell for Congress: \$3000 on 6/28/07, \$2000 on 12/21/07, and \$3000 on 3/31/08. The first two contributions were with respect to the 2008 primary election. The third contribution, made on 3/31/08 in the amount of \$3000, was inadvertently designated for the 2008 primary election. It should have been designated for the 2008 general election. I have filed an amendment to our report that reflects this correction.

Your second issue concerns the disbursement on March 17, 2008 in the amount of \$5454.60 for "Tickets to Event". This disbursement involved the purchase of concert tickets for a Victory NOW PAC fundraiser at the Verizon Center. This fundraiser was not on behalf of specifically identified federal candidates. It was a general fundraiser for Victory NOW PAC. You raised this issue with respect to our March Monthly Report as well. Please let me know if I am doing something in my reports that somehow erroneously indicates that these fundraisers are for specifically identified federal candidates.

Your third issue concerns administrative expenses for Victory NOW PAC. Payments for office rent (inclusive of utilities), payroll taxes (including D.C. withholding taxes and IRS/EFTPS payments), and salaries for management and fundraising services all have been reported on at least one of these three reports. In addition, during the first three months of this year, payments have been made to AT&T in the amounts of \$8.39 and \$2.59 for long distance phone calls, and to Verizon in the amounts of \$35.29, \$34.02 and \$33.59 for general fees related to office phones. However, since these payments do not yet aggregate in excess of \$200 in a calendar year, they have not yet been itemized. A federal unemployment insurance payment is due only annually. State unemployment insurance payments are due quarterly, so the first one should show up on our May Monthly Report. Please let me know if you need any additional information concerning this issue.

As always, please feel free to call me if you have any questions at all. Thanks.

Very truly yours,

Jennifer Lewis Smith
Treasurer
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